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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

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In the Matter of)
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Advanced Televisions Systems and Their)
Impact Upon the Existing Television)
Broadcast the Service)
_____)

MM Docket No. 87-268

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To: The Commission

REPLY COMMENTS OF SANTA MONICA COMMUNITY COLLEGE DISTRICT.

Santa Monica Community College District ("SMCCD") hereby files its reply comments in the above-referenced proceeding. Sixth Further Notice of Proposed Rulemaking, FCC 96-317 (Aug. 14, 1996).

SMCCD is the licensee of KCRW (FM) in Santa Monica, California, which is part of the Greater Los Angeles area. KCRW (FM) operates on a frequency of 89.9 MHz and provides award-winning educational programming to the Greater Los Angeles area. Part of SMCCD's success is dependent on the clarity of the signal received within its service area. That signal quality would be severely compromised if the Commission accepted the proposal of the Broadcasters and relocated KTLA-TV in Los Angeles from Channel 5 to Channel 6 for DTV.¹

In their comments, the Broadcasters explained that they had "produced a Modified Table [of Allotments] that demonstrates that use of the full television band

¹ Broadcasters Comments (Nov. 22, 1996), Appendix E2 at 4.

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reduces interference to existing NTSC and to new DTV stations and improves opportunities for replication and maximization." Broadcasters' Comments at 42. The Broadcasters then urged the Commission to adopt the following guiding principle in making DTV allotments. "As a general rule, the Commission should approve any proposed change (whether pre- or post-adoption of a DTV Table) that does not cause unaccepted additional interference to assigned NTSC or DTV stations." Broadcasters' Comments at 50 (footnote omitted).

As the foregoing quotations demonstrate, the Broadcasters' sole focus in developing a modified table of DTV allotments was the signal coverage of television stations. Nowhere did the Broadcasters give any weight to any interference that might be caused to FM radio stations. The Broadcasters casually dismissed the long-standing interference problems between FM radio stations and Channel 6, stating that "the lower power of DTV transmitters, the improved performance of DTV transmitter out-of-band emissions and improved DTV receivers will reduce interference between DTV Channel 6 and FM radio." Broadcasters' Comments at 46 (footnote omitted).

Annexed hereto is the declaration of Kevin E. Scott, SMCCD's Chief Engineer. In that declaration, Mr. Scott points out that relocation of KTLA from Channel 5 to Channel 6 would generate substantial interference to KCRW and compromise the distribution of its programming in its service area. Mr. Scott also explains why the Broadcasters are wrong in assuming that the previous and long-standing problems of FM Channel 6 interference can be cured by lower-power DTV transmitters, the improved

performance of DTV transmitter out-of-band emissions, and improved DTV Receivers.

While those technological advancements may ameliorate the problem to some extent, they have not, and cannot, provide any assurance that the interference will be eliminated or of no consequence to the public.

SMCCD therefore urges the Commission to implement its proposal to utilize a "core spectrum" of Channels 7-51 and not utilize Channel 6 for provision of DTV television service, especially in Los Angeles. If the Commission does accept the Broadcasters' Modified Table and assigns KTLA operations to Channel 6 for DTV, the Commission should at least take further steps to protect incumbent FM licensees from interference caused by these DTV operations. It is well established that the "newcomer" (KTLA in this instance and any DTV operation moving to Channel 6 generally) is responsible for resolving interference caused to an incumbent broadcaster.² The Broadcasters do not acknowledge let alone discuss that precedent. At a minimum, the relocated DTV licensee should be responsible for resolving interference caused by with the Channel 6 transmission. Any costs associated with the resolution of interference problems would then be KTLA's responsibility

² Amendment of Parts 21 and 74 of the Commission's Rules, 10 FCC Rcd. 13821, 13829 (1995); In re Resolution of Interference between UHF channels 14 and 69, 2 FCC Rcd. 7328 (1987).

WHEREFORE, in view of the foregoing and the entire record herein, it is respectfully requested that the Commission reject the Broadcasters' proposal to reallocate KTLA-TV in Los Angeles from Channel 5 to Channel 6.

Respectfully submitted,

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College District

By: Christopher T. McGowan
Lewis J. Paper
Christopher T. McGowan

Dated: January 24, 1997

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NO.375 P002

DECLARATION

I, Kevin Edward Scott, do hereby declare the following:

1. I am the Chief Engineer of KCRW-FM in Santa Monica, California, which is licensed to the Santa Monica Community College District. I have over seventeen years of experience in the broadcasting industry. During that time I have been variously employed as Chief Engineer, Assistant Chief Engineer, and Director of Engineering, and have also done extensive engineering consulting. I have extensive experience in solving problems involving RF interference, inter-modulation, re-radiation, spurious emissions, out-of-band products, and other undesirable RF elements. I have special expertise in solving RF problems involving the close locating of multiple facilities of different class and spectrum usage. In the late 1980's, I filed reports with the Commission on the methods used to solve interference between 93.7 FM on Indio Peak, California and two-way radios operated for JPK Memorial Hospital in Indio, California. My experience at WEEM Pendleton, Indiana included solving interference problems between WEEM and Television Station WRTV on Channel 6 in Indianapolis.

2. If the Federal Communications Commission ("Commission") relocates KTLA-TV in Los Angeles, California from Channel 5 to Channel 6, as has been proposed in the Commission's DTV proceeding, KCRW would experience substantial interference in its primary coverage areas.

3. The potential for interference is compounded by the fact that KTLA and KCRW are located approximately 16.7 miles apart. This creates a much larger problem than would be the case if the transmitters were co-located. The radio interference from KCRW to KTLA would be especially excessive at KCRW's transmitter site. Conversely, the interference to KCRW's radio signal would be excessive in areas closer to KTLA's transmitting equipment. I would expect the interference to affect 27% of KCRW's service areas within its 1 mV/m contour. Such interference would seriously degrade the quality of reception of KCRW to detriment of its listeners.

4. I do not agree with the Broadcasters' assertion on page 46 of their comments that the lower power of DTV transmitters, the improved performance of DTV transmitter out-of-band emissions, and improved DTV receivers will reduce interference between DTV Channel 6 and FM Radio to a potentially acceptable point. DTV is an unproven technology at this point, and any testing of DTV equipment has been done in co-located situations. To my knowledge, there is no test which demonstrates that there would be no interference, and there is certainly no "real-world" experience to support the Broadcasters' assumptions. I believe that in the instance of KTLA and KCRW, excessive interference will be generated and will adversely affect KCRW's signal.

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I hereby declare under penalty of perjury that the foregoing is true and correct.



Kevin Edward Scott

Dated: January 24, 1997


SENT BY:KCRM

CERTIFICATE OF SERVICE

I hereby certify that on January 24, 1997, a copy of the foregoing Reply
Comments of Santa Monica Community College District was sent by first class postage
prepaid United States mail to:

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